

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Advanced Television Systems)
and Their Impact on the)
Existing television Broadcast)
Service)
)
Review of Technical and)
Operational Requirements:)
Part 73-E, Television Broadcast)
Stations)
)
Reevaluation of the UHF Television)
Channel and Distance Separation)
Requirements of Part 73 of the)
Commission's Rules)

MM Docket No. 87-268

REPLY COMMENTS OF THE AMERITECH OPERATING COMPANIES

The Ameritech Operating Companies^{1/} submit these reply comments in response to the Commission's tentative decision and further notice of inquiry in this docket.^{2/}

The Ameritech Operating Companies limited their previously filed comments in this docket to one particular issue. They

1/ The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

2/ In the Matter of Advanced Television Systems and Their Impact on the Existing Television Broadcast Service; Review of Technical and Operation Requirements: Part 73-E, Television Broadcast Stations; Reevaluation of the UHF Television Channel and Distance Separation Equipments of Part 73 of the Commission's Rules, MM Docket No. 87-268, Tentative Decision and Further Notice of Inquiry, FCC 88-288 (released September 1, 1988) ("FNOI").

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urged the Commission to avoid any action that would reduce the benefits of high definition television ("HDTV") technology that would otherwise be available to consumers from non-broadcast media. Particularly, the Ameritech Operating Companies argued that the Commission should not attempt to define a video display standard that is constrained by the limitations of the broadcast medium.

None of the parties submitting comments in response to the FNOI has suggested that the Commission do otherwise. No one has argued for the proposition that, because of spectrum limitations faced by terrestrial broadcasters, the Commission should impose an HDTV display standard on the country that limits the display quality to the type that can be supplied by terrestrial broadcasters.

Again, the Ameritech Operating Companies point out that whatever HDTV standard is adopted is likely to be operational well into the next century. The current and potential variety of sources of video information as well as the rapidly evolving state of technology argue against the creation of a single standard that limits display characteristics to the quality that can be achieved from a single particular information source or transmission medium.

As the Ameritech Operating Companies indicated in their comments, if the Commission is inclined to dictate a display standard to provide industry direction and marketplace stability, a set of standards would be appropriate. The lead standard of the set would be the display standard that would allow the

consuming public to receive the highest quality video signals regardless of the limitations of any particular transmission medium. Interface standards could then be adopted consistent with the display standard and the characteristics of individual transmission media. Finally, a terrestrial broadcasting standard could be established consistent with both the display and interface standards. This process will insure that consumers will continue to be able to obtain the highest quality video signals technology can provide from a variety of sources while at the same time addressing the unique problems associated with the terrestrial broadcast of HDTV signals.

Respectfully submitted,

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DATED: January 23, 1989

CERTIFICATE OF SERVICE

I, Mary S. Shuper, hereby certify that a true copy of the foregoing Reply Comments of the Ameritech Operating Companies was this date served by first class mail, postage prepaid, upon each party on the attached service list.

By: Mary S. Shuper
Mary S. Shuper

DATED: January 23, 1989